

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

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SPERO HARITATOS,	:	
	:	
Plaintiff,	:	05 Civ. 930 (DNH/GJD)
	:	
- against -	:	
	:	
HASBRO, INC.	:	
and TOYS "R" US-NY LLC,	:	
	:	
Defendants.	:	
	:	
-----	X	

DECLARATION OF SEAN WIGGINS

I, Sean Wiggins, declare and state as follows:

1. I am employed by defendant Hasbro, Inc. ("Hasbro") as a Paralegal in the Office of the General Counsel, where I have day-to-day responsibilities for maintaining Hasbro's intellectual properties, including the CANDY LAND trademark, and enforcing those rights. I have held this position since December, 2002. I submit this declaration, based on personal knowledge, in support of Hasbro's Memorandum of Law in Opposition to Plaintiff's Motion to Strike the Declarations of Jill Hambley and Sean Wiggins.

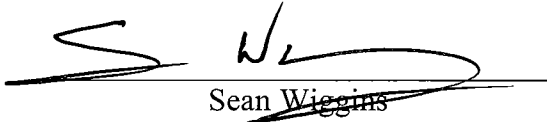
2. I and others employed in the Office of the General Counsel at Hasbro regularly monitor the use of CANDY LAND or similar marks as part of Hasbro's efforts to protect its famous CANDY LAND[®] trademark from infringement. The Trademark Research Report (attached as Exhibit A to the declaration I signed on May 29 in support of Hasbro's Motion for Summary Judgment) is one example of the trademark search reports I and others in the Office of the General Counsel at Hasbro regularly obtain in the course of our employment.

3. Attached hereto as Exhibit A are the receipts¹ for the goods I purchased that were listed in paragraph 3 of my May 29 declaration, which I purchased in the course of performing my job duties.

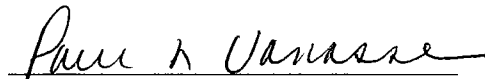
4. I located the websites identified in paragraph 4 of my May 29 declaration in the course of performing my job duties over the course of the past several months.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 12th, 2007, at Pawtucket, Rhode Island.


Sean Wiggins

Sworn to before me this
12th day of July, 2007


Notary Public



¹ I never received any kind of receipt from J.T.'s Kandyland Express, so no receipt from that purchase is attached.

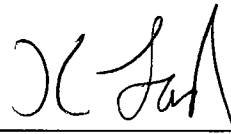
CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing **DECLARATION OF SEAN WIGGINS IN SUPPORT OF HASBRO'S MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFF'S MOTION TO STRIKE THE DECLARATIONS OF JILL HAMBLEY AND SEAN WIGGINS** to be filed electronically with the Court, with copies sent electronically and by First Class Mail to the counsel set forth below on July 16, 2007:

Robert E. Purcell, Esq.
Hiscock & Barclay
Attorneys for Plaintiff Spero Haritatos
One Park Place
Syracuse, New York 13202
(315) 422-2131

and

John G. McGowan, Esq.
Bond, Schoeneck & King, PLLC
Attorneys for Defendant Toys "R" Us
One Lincoln Center
Syracuse, New York 13202-1355
(315) 218-8121



Kim Landsman

EXHIBIT A

Wiggins, Sean

From: annabushnell@dolles.com
Sent: Tuesday, March 06, 2007 10:34 AM
To: Wiggins, Sean
Subject: Your Purchase at Dolles Candyland

This is a confirmation email that your purchase has been received at Dolles.com. Once your order has been reviewed we will ship your products as soon as possible. This email acts as your receipt so we recommend you keep it for future reference if necessary. If you have any questions or comments please contact us at annabushnell@dolles.com and please be sure to include your order number and name.

Thank you for shopping with Dolles.com.

ORDER NUMBER: 876**Items Purchased**

Name	Option	Quantity	Price
One Pound Assorted Stick Shaped Salt Water Taffy		1	\$6.25
Sub Total:			\$6.25
Sales Tax:			\$0.00
Shipping Cost:			\$7.50
Total Price:			\$13.75

Your Information

Name: Sean Wiggins
Email: swiggins@hasbro.com
Phone: 401-727-5735

Billing Information

Address 1: 146 Glenbrook Road
Address 2:
City: Warwick
State: RI
Zip Code: 02889
Country: usa

Shipping Information

Name: Sean Wiggins
Address 1: 1027 Newport Ave
Address 2:
City: Pawtucket

3/6/2007

State:

RI

Zip Code:

02862

Country:

usa

Remark:

3/6/2007

Wiggins, Sean

From: Candyland Crafts [orders@candylandcrafts.com]
Sent: Tuesday, March 06, 2007 10:49 AM
To: Wiggins, Sean
Subject: 11596 - Secure Online Credit Card Transaction

Dear Sean Wiggins
 Thank you for your order!

Your order will be shipped pending credit card approval.

Customer/Order Confirmation Number 11596 Date and Time: Tue Mar 06 10:49:25 2007

Item:	Details:	Quantity:	Each:	Item Total:
Shamrock Pan	(2105-185)	1	\$ 7.99	\$ 7.99
Sub Total:			\$ 7.99	
Shipping Total: (1. Continental USA & order is under \$300)			\$ 6.95	
Grand Total:			\$ 14.94 Pending	

These products will be shipped to:

Sean Wiggins
 1027 Newport Ave
 Pawtucket Rhode Island 02862
 USA
 401-727-5735
 swiggins@hasbro.com

Billing address:

Sean Wiggins
 146 Glenbrook Road
 Pawtucket Rhode Island 02889
 USA
 401-727-5735
 Swiggins@hasbro.com

Candyland Crafts
<http://www.candylandcrafts.com/>
orders@candylandcrafts.com

Wiggins, Sean

From: orders@thecandylandstore.com
Sent: Tuesday, March 06, 2007 11:03 AM
To: Wiggins, Sean
Subject: Thank you for your order

We will be in touch as soon as possible about your order, the details of which are as follows:

Order ID: 2180
Customer Details:
Sean Wiggins
146 Glenbrook Road
Warwick, RI
02889
United States of America
Email: swiggins@hasbro.com
Phone: 401-727-5735
Shipping Details:
Sean Wiggins
1027 Newport Ave
Pawtucket, RI
02862
United States of America
Phone: 401-727-5735

Shipping Method: Standard Shipping
Customer certifies shipping is to a commercial location.

Product ID: retro
Product Name: Retro Candy Mason Jar
Quantity: 1
Unit Price: \$12.99
 > Add A Card : No

Order Total : \$12.99
Shipping : \$6.33
Grand Total : \$19.32

3/6/2007

Wiggins, Sean

From: shipping@zebs.com
Sent: Tuesday, March 06, 2007 11:07 AM
To: Wiggins, Sean
Subject: Zebs Store Order

Thank you for ordering from the Zebs website. Your order details are below.
All orders are shipped promptly, and we will be in contact with you via email when the order ships.

OrderID: 2568
CustomerID: 1173197541

Bill to:

Sean P Wiggins
146 Glenbrook Road
Warwick, RI 02889

Phone: 401-727-5735
Email: swiggins@hasbro.com

Ship to:

Sean Wiggins
1027 Newport Ave
Pawtucket, RI 02862

Phone: 401-727-5735
Email:
Ship to Arrive By:

Visa
Card Number: xxxxxxxxxxxxxx6875
Expires: 02/06
Name on Card: Sean Wiggins

ITEMS ORDERED:
Item Number: CRT202
Item: Zeb's Candy Land Basket
Quantity: 1
Price ea.: \$34.95
Ext. Price: \$34.95

Total Items: 1
Shipping: \$11.95
Total: \$46.90